IN THE UNITED STATES DISTRICT FOR THE EASTERN DISTRICT OF VIRGINIA **Newport News Division**

BOBBY BLAND, DANIEL RAY CARTER, JR., DAVID W. DIXON, ROBERT W. MCCOY, JOHN C. SANDHOFER, and DEBRA H. WOODWARD

Plaintiffs.

CASE NO4:11-CV-45

v.

B.J. ROBERTS, individually and in his official capacity as Sheriff of the City of Hampton, Virginia

Defendant.

Jones (formerly Larking)

- I, Ramona Larkin, having direct knowledge of the information set forth below, hereby depose and declare as follows:
- 1. I am a citizen and resident of the Commonwealth of Virginia and the United States. I maintain my principal residence at 530 South Azalea Road, Petersburg, Virginia 23805.
- 2. I was employed as a Deputy Sheriff with the Hampton Sheriff's office during a portion of the Sheriff's re-election campaign of 2009.
- 3. In late August, 2009, I co-hosted a cookout at Buckroe Beach in Hampton. Several of my co-workers were invited to the cookout. After I returned to work, I was approached by my supervisor, Lt. Crystal Cooke, and she made a statement to the effect of "I heard Jim Adams was at your cookout" or words to that effect. Jim Adams was Sheriff Roberts' opponent in the upcoming November election. I told her that he was present, and that he had been invited by Danny Carter, another deputy within the Hampton Sheriff's office.

Declarant's Initials: BBA

4. Shortly after my conversation with Lt. Cooke, I was approached by Major (then Captain) Kenneth Richardson. He inquired as to who was at the cookout, and I confirmed that Jim Adams was there. Major Richardson made a general statement that the event had the appearance of a campaign event and said specifically that "it does not look good".

5. I informed Major Richardson that Danny Carter had invited Adams. Major Richardson informed me that I needed to explain that to the Sheriff. I definitely got the impression after my discussions with Lt. Cooke and Major Richardson that I needed to "clear my name" and make it known that I had not invited Jim Adams to the cookout.

I declare under penalty of perjury under the laws of the United States that the foregoing statement is true and correct.

Ramona Larkins(formerly known as)